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09/17/2004 04:51 PM

To: FarmBillRules <FarmBillRules@USDA.gov>  
cc:  
Subject: Conservation Security Program Interim Final Rule Comments

Please find attached request.



CSP Comments to USDA 091704.pdf

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SEP 29 2004



WASHINGTON STATE DEPARTMENT OF  
**Natural Resources**

2002  
DOUG SUTHERLAND  
Commissioner of Public Lands

September 17, 2004

Natural Resources Conservation Service  
Conservation Security Program  
[farmbillrules@usda.gov](mailto:farmbillrules@usda.gov)

**Subject: Conservation Security Program Interim Final Rule Comments**

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385  
The Washington State Department of Natural Resources (DNR) manages more than 1 million acres of agricultural lands for the benefit of the common school trust fund of the state of Washington. Since the revenues from these federally granted trust (school) lands are used as an endowment for school construction, these department-managed lands have historically been eligible for federal farm program payments. The Conservation Security Program (CSP) is one of the few federal farm programs where state trust lands are not eligible.

DNR manages state trust land via leases. These leases are long term (10 years) and traditionally are renewed to the same lessee over decades. Many leases have been in the same family for over 50 years as they have been passed from one generation to the next. The lessee is required, through the lease agreement, to implement conservation practices, to ensure sustainability, to provide resource protection and to maintain or improve the ecological capacity of the leased state trust lands.

DNR requires our lessees to be very aggressive in implementing conservation practices, ones that are rewarded under CSP; however, these lessees are being penalized by not being allowed to participate in CSP. This is a significant dis-incentive to conservation on these school trust lands.

We believe that the federally granted school trust lands within the State of Washington should be allowed to enroll in the Conservation Security Program for the following reasons:

- Our leases are long term in nature
- Our leases are often passed from generation to generation of family farmers
- Our lessee is the decision maker when enrolling in farm programs
- Our lessee is the decision maker regarding crop selection and rotation

We are requesting that the eligibility restrictions be amended and that federally granted trust (school) lands be allowed to enroll in the Conservation Security Program.

Sincerely,

R. Bruce Mackey  
Lands Steward